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12 CORPORATION

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

15 VARDAN GRIGORYAN, an
16 individual,
17
18 Plaintiff,
19
20 v.
21 TARGET CORPORATION, a
22 corporation, and DOES 1 to 20,
23 inclusive,
24 Defendant.

Case No.

(State Case No. 22STCV6366)

**NOTICE OF REMOVAL OF
ACTION UNDER 28 U.S.C. 1441(b)1
(DIVERSITY); DECLARATION OF
GABRIELLA A. PEDONE**

25 TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR
26 THE CENTRAL DISTRICT OF CALIFORNIA:

27 PLEASE TAKE NOTICE THAT defendant TARGET CORPORATION
28 (hereinafter, "Target" or "Defendant") hereby removes to this Court the state court
action described below.

1. On August 15, 2022, an action was commenced in the Superior Court
of the State of California in and for the County of Los Angeles County, entitled
VARDAN GRIGORYAN, an individual, Plaintiff vs. TARGET CORPORATION
and DOES 1 through 10, inclusive, Defendants, as Case Number 22STCV6366 (the
"Action"). A true and correct copy of Plaintiff's Complaint is attached hereto as
Exhibit "A."

Case No.

**NOTICE OF REMOVAL OF ACTION UNDER 28 U.S.C. 1441(b)1 (DIVERSITY); DECLARATION OF
GABRIELLA A. PEDONE**

1 2. Target was first served a copy of the Complaint on August 16,
2 2022. A true and correct copy of the Proof of Service of Process is attached
3 hereto as **Exhibit "B."**

4 3. Plaintiff was, at the time she filed the Action and still is, a citizen of
5 the State of California.

6 4. On September 15, 2022, Target filed and served its Answer to the
7 Complaint, Demand for Jury Trial with the California Superior Court. A true
8 and correct copy of Target's Answer to Complaint, Demand for Jury Trial is
9 attached hereto as **Exhibit "C."**

10 5. On March 4, 2022, Plaintiff sent his demand letter demanding "the
11 full policy limit on Target Corporation's policy in exchange for a full and final
12 settlement of all of his claims related to the above-referenced incident which
13 occurred on November 8, 2020." A true and correct copy of Plaintiff's demand
14 letter is attached hereto as **Exhibit "D."**

15 6. Target's insurance limits above its self-insured retention is
16 \$2,000,000.

17 7. Plaintiff's demand of Target's policy limit of \$2,000,000.00.
18 surpasses the jurisdictional amount in controversy minimum of \$75,000

19 8. Target is informed and believes that Plaintiff was, at the time he filed
20 the Action, and still is a citizen of the State of California

21 9. This removal is timely and was filed within thirty (30) days of receipt
22 by Defendant, of a copy of Plaintiff's Demand, and within the time limit for
23 Defendant to file its removal. This is Defendant's first opportunity to timely remove
24 this case, from when it was first ascertained that the case is one which is or has
25 become removable.

26 10. This action is a civil action of which this Court has original
27 jurisdiction under 28 U.S.C. §1332, and is one which may be removed to this
28 Court by defendant pursuant to the provisions of 28 U.S.C. §1441(a) in that this is

1 a civil action between citizens of different states and the matter in controversy
2 exceeds the sum of \$75,000.00, exclusive of interest and costs.

3 11. Target is the only named defendant; the other defendants in this
4 action are fictitiously named, designated as DOES 1 to 10, and their citizenship
5 shall not be considered in determining diversity jurisdiction. 28 U.S.C. §1446(b).

6 12. Target Corporation was, at the time of the filing of this action, and still
7 is, a citizen of the State of Minnesota, incorporated under the laws of the State of
8 Minnesota, with its principal place of business in the State of Minnesota. Both the
9 California Secretary of State and Minnesota Secretary of State identify Target
10 Corporation as a Minnesota Corporation with its principle address at 1000 Nicollet
11 Mall, Minneapolis, Minnesota 55403 on their respective websites. True and
12 correct copies of search results for Target Corporation on those websites are
13 attached hereto as **Exhibit "E."**

14 11. Pursuant to 28 U.S.C. §1446(a), true and correct copies of all process,
15 pleadings, and orders sent to and received by Target in the State Court action are
16 attached hereto.

17
18 DATED: September 15, 2022

MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP

19
20
21 By: /s/ Gabriella Pedone

22 Eugene J. Egan
23 Gabriella Pedone
24 Attorneys for Defendants, TARGET
25 CORPORATION
26
27
28

DECLARATION OF GABRIELLA A. PEDONE

I, Gabriella A. Pedone, declare as follows:

1. I am an attorney duly admitted to practice in the courts of the State of California and am an attorney with Manning & Kass, Ellrod, Ramirez, Trester LLP, attorneys of record for Defendant TARGET CORPORATION. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify thereto. I make this declaration in support of Defendant's Notice of Removal of Action Under 28 U.S.C. §1441(b)1 (diversity).

2. On August 15, 2022, an action was commenced in the Superior Court of the State of California in and for the County of Los Angeles, entitled VARDAN GRIGORYAN, an individual, Plaintiff vs. TARGET CORPORATION and DOES 1 through 10, inclusive, Defendants, as Case Number 22STCV6366 (the "Action"). A true and correct copy of Plaintiffs Complaint is attached hereto as **Exhibit "A."**

3. Target was first served a copy of the Complaint on August 16, 2022. A true and correct copy of the Proof of Service of Process is attached hereto as **Exhibit "B."**

4. Plaintiff was, at the time she filed the Action and still is, a citizen of the State of California.

5. On September 15, 2022, Target filed and served its Answer to the Complaint, Demand for Jury Trial with the California Superior Court. A true and correct copy of Target's Answer to Complaint, Demand for Jury Trial is attached hereto as **Exhibit "C."**

6. On March 4, 2022, Plaintiff sent his demand letter demanding "the full policy limit on Target Corporation's policy in exchange for a full and final settlement of all of his claims related to the above-referenced incident which occurred on November 8, 2020." A true and correct copy of Plaintiff's demand letter is attached hereto as **Exhibit "D."**

1 7. Target's insurance limits above its self-insured retention is \$2,000,000.

2 8. Plaintiff's demand of Target's policy limit of \$2,000,000.00 surpasses
3 the jurisdictional amount in controversy minimum of \$75,000

4 9. Target is informed and believes that Plaintiff was, at the time he filed
5 the Action, and still is a citizen of the State of California.

6 10. This removal is timely and was filed within thirty (30) days of receipt
7 by Defendant, of a copy of Plaintiff's Demand, and within the time limit for
8 Defendant to file its removal. This is Defendant's first opportunity to timely remove
9 this case, from when it was first ascertained that the case is one which is or has
10 become removable.

11 11. This action is a civil action of which this Court has original
12 jurisdiction under 28 U.S.C. §1332, and is one which may be removed to this Court
13 by defendant pursuant to the provisions of 28 U.S.C. §1441(a) in that this is a civil
14 action between citizens of different states and the matter in controversy exceeds the
15 sum of \$75,000.00, exclusive of interest and costs.

16 12. Target is the only named defendant; the other defendants in this action
17 are fictitiously named, designated as DOES 1 to 10, and their citizenship shall not be
18 considered in determining diversity jurisdiction. 28 U.S.C. §1446(b).

19 13. Target Corporation was, at the time of the filing of this action, and still
20 is, a citizen of the State of Minnesota, incorporated under the laws of the State of
21 Minnesota, with its principal place of business in the State of Minnesota. Both the
22 California Secretary of State and Minnesota Secretary of State identify Target
23 Corporation as a Minnesota Corporation with its principle address at 1000 Nicollet
24 Mall, Minneapolis, Minnesota 55403 on their respective websites. True and correct
25 copies of search results for Target Corporation on those websites are attached
26 hereto as **Exhibit "E.)**

27
28

Gabriella A. Pedone

EXHIBIT A

SUM-100

SUMMONS
(CITACION JUDICIAL)

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):

TARGET CORPORATION, a corporation, and DOES 1 TO 20 inclusive

YOU ARE BEING SUED BY PLAINTIFF:

(LO ESTÁ DEMANDANDO EL DEMANDANTE):

Vardan Grigoryan, an individual

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. ¡AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es): Los Angeles Superior Court

Central District - Spring Street Courthouse
312 N Spring Street, Los Angeles, CA 90012

CASE NUMBER:
(Número del Caso):

22STCV26366

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Armen Kiramijyan; KAASS LAW; 815 E Colorado Street, Suite 220, Glendale, CA 91205; 310.943.1171

Sherri R. Carter Executive Officer / Clerk of Court

DATE: 08/15/2022
(Fecha)

Clerk, by
(Secretario)

R. Perez, Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

(SEAL)



NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):

3. ☒ on behalf of (specify): Target Corporation, a Corporation
under: ☐ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)

4. ☒ other (specify):
☒ by personal delivery on (date): 8/16/22

PLD-PI-001

1. **Plaintiff** (name or names): **Vardan Grigoryan**
alleges causes of action against **defendant** (name or names):
TARGET CORPORATION, and Does 1 to 20

2. This pleading, including attachments and exhibits, consists of the following number of pages: **5**

3. Each plaintiff named above is a competent adult

a. ☐ **except** plaintiff (name):

(1) ☐ a corporation qualified to do business in California

(2) ☐ an unincorporated entity (describe):

(3) ☐ a public entity (describe):

(4) ☐ a minor ☐ an adult

(a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed

(b) ☐ other (specify):

(5) ☐ other (specify):

b. ☐ **except** plaintiff (name):

(1) ☐ a corporation qualified to do business in California

(2) ☐ an unincorporated entity (describe):

(3) ☐ a public entity (describe):

(4) ☐ a minor ☐ an adult

(a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed

(b) ☐ other (specify):

(5) ☐ other (specify):

Page 1 of 3

PLD-PI-001

SHORT TITLE: Grigoryan v. TARGET CORPORATION	CASE NUMBER:
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4. ☐ Plaintiff (name):
is doing business under the fictitious name (specify):

and has complied with the fictitious business name laws.
5. Each defendant named above is a natural person
- a. ☒ except defendant (name): Target Corporation
 (1) ☐ a business organization, form unknown
 (2) ☒ a corporation
 (3) ☐ an unincorporated entity (describe):
 (4) ☐ a public entity (describe):
 (5) ☐ other (specify):
- b. ☐ except defendant (name):
 (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (describe):
 (4) ☐ a public entity (describe):
 (5) ☐ other (specify):
- c. ☐ except defendant (name):
 (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (describe):
 (4) ☐ a public entity (describe):
 (5) ☐ other (specify):
- d. ☐ except defendant (name):
 (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (describe):
 (4) ☐ a public entity (describe):
 (5) ☐ other (specify):
- ☐ Information about additional defendants who are not natural persons is contained in Attachment 5.
6. The true names of defendants sued as Does are unknown to plaintiff.
- a. ☒ Doe defendants (specify Doe numbers): 1 to 5 were the agents or employees of other named defendants and acted within the scope of that agency or employment.
- b. ☒ Doe defendants (specify Doe numbers): 6 to 20 are persons whose capacities are unknown to plaintiff.
7. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (names):
8. This court is the proper court because
- a. ☐ at least one defendant now resides in its jurisdictional area.
- b. ☐ the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.
- c. ☒ injury to person or damage to personal property occurred in its jurisdictional area.
- d. ☐ other (specify):
9. ☐ Plaintiff is required to comply with a claims statute, and
- a. ☐ has complied with applicable claims statutes, or
- b. ☐ is excused from complying because (specify):

PLD-PI-001

SHORT TITLE: Grigoryan v. TARGET CORPORATION	CASE NUMBER:
---	--------------

10. The following causes of action are attached and the statements above apply to each (*each complaint must have one or more causes of action attached*):

- a. ☐ Motor Vehicle
- b. ☒ General Negligence
- c. ☐ Intentional Tort
- d. ☐ Products Liability
- e. ☒ Premises Liability
- f. ☐ Other (*specify*):

11. Plaintiff has suffered

- a. ☒ wage loss
- b. ☐ loss of use of property
- c. ☒ hospital and medical expenses
- d. ☒ general damage
- e. ☐ property damage
- f. ☒ loss of earning capacity
- g. ☐ other damage (*specify*):

12. ☐ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. ☐ listed in Attachment 12.
- b. ☐ as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

Los Angeles Superior Court

14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) ☒ compensatory damages
- (2) ☐ punitive damages

The amount of damages is (*in cases for personal injury or wrongful death, you must check (1)*):

- (1) ☒ according to proof
- (2) ☐ in the amount of: \$

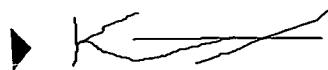
15. ☒ The paragraphs of this complaint alleged on information and belief are as follows (*specify paragraph numbers*):

6

Date: 08/15/2022

Armen Kiramijyan

(TYPE OR PRINT NAME)



(SIGNATURE OF PLAINTIFF OR ATTORNEY)

PLD-PI-001(4)

SHORT TITLE:
Grigoryan v. TARGET CORPORATION

CASE NUMBER:

First

CAUSE OF ACTION—Premises LiabilityPage 4

(number)

ATTACHMENT TO ☒ Complaint ☐ Cross-Complaint

(Use a separate cause of action form for each cause of action.)

Prem.L-1. (name): Vardan Grigoryan

alleges the acts of defendants were the legal (proximate) cause of damages to plaintiff.

On (date): November 08, 2020 plaintiff was injured on the following premises in the following fashion (description of premises and circumstances of injury):

Plaintiff fell on the premises located at 1800 Empire Avenue, Burbank, CA 91504. Defendants failed to maintain the premises in a reasonably safe condition by leaving a slippery substance on the floor. Plaintiff slipped on the slippery substance and fell. Defendants created a dangerous condition by leaving a slippery substance on the floor.

Prem.L-2. ☒ **Count One—Negligence** The defendants who negligently owned, maintained, managed and operated the described premises were (names):

TARGET CORPORATION

☒ Does 1 to 20

Prem.L-3. ☐ **Count Two—Willful Failure to Warn** [Civil Code section 846] The defendant owners who willfully or maliciously failed to guard or warn against a dangerous condition, use, structure, or activity were (names):

☐ Does _____ to _____Plaintiff, a recreational user, was ☐ an invited guest ☐ a paying guest.

Prem.L-4. ☐ **Count Three—Dangerous Condition of Public Property** The defendants who owned public property on which a dangerous condition existed were (names):

☐ Does _____ to _____

a. ☐ The defendant public entity had ☐ actual ☐ constructive notice of the existence of the dangerous condition in sufficient time prior to the injury to have corrected it.

b. ☐ The condition was created by employees of the defendant public entity.

Prem.L-5.a. ☒ **Allegations about Other Defendants** The defendants who were the agents and employees of the other defendants and acted within the scope of the agency were (names):

TARGET CORPORATION

☒ Does 1 to 5

b. ☐ The defendants who are liable to plaintiffs for other reasons and the reasons for their liability are ☐ described in attachment Prem.L-5.b ☐ as follows (names):

Page 1 of 1

Form Approved for Optional Use
Judicial Council of California PLD-
PI-001(4) (Rev. January 1, 2007)

CAUSE OF ACTION—Premises Liability

Code of Civil Procedure, § 425.12
www.courts.ca.gov

For your protection and privacy, please press the Clear
This Form button after you have printed the form.

Print this form

Save this form

Clear this form

PLD-PI-001(2)

SHORT TITLE:

Grigoryan v. TARGET CORPORATION

CASE NUMBER:

Second

(number)

CAUSE OF ACTION—General NegligencePage 5ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): Vardan Grigoryan

alleges that defendant (name): TARGET CORPORATION, and

☒ Does 1 to 20

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): 11/08/2020

at (place): 1800 Empire Ave, Burbank, CA 91504

(description of reasons for liability):

Plaintiff is informed and believes that Defendant TARGET CORPORATION and/or Defendants Does 1 to 20 (collectively "Defendants") owned, maintained, and/or managed the supermarket located at 1800 Empire Ave, Burbank, CA 91504 ("Premises"). Plaintiff fell when he was at the Premises. Defendants had a duty to maintain the Premises in a reasonably safe condition. Defendants left a slippery substance on the floor at the Premises. Defendants created a dangerous condition by leaving the slippery substance on the floor at the Premises. The dangerous condition created by the Defendants caused Plaintiff to fall and sustain injuries. Defendants breached their duty by failing to clean the Premises and leaving the slippery substance on the floor. Defendants' negligence was a substantial factor in causing injuries to Plaintiff.

Page 1 of 1



Superior Court of California, County of Los Angeles

ALTERNATIVE DISPUTE RESOLUTION (ADR) INFORMATION PACKAGE

THE PLAINTIFF MUST SERVE THIS ADR INFORMATION PACKAGE ON EACH PARTY WITH THE COMPLAINT.

CROSS-COMPLAINANTS must serve this ADR Information Package on any new parties named to the action with the cross-complaint.

What is ADR?

ADR helps people find solutions to their legal disputes without going to trial. The main types of ADR are negotiation, mediation, arbitration, and settlement conferences. When ADR is done by phone, videoconference or computer, it may be called Online Dispute Resolution (ODR). These alternatives to litigation and trial are described below.

Advantages of ADR

- **Saves Time:** ADR is faster than going to trial.
- **Saves Money:** Parties can save on court costs, attorney's fees, and witness fees.
- **Keeps Control** (with the parties): Parties choose their ADR process and provider for voluntary ADR.
- **Reduces Stress/Protects Privacy:** ADR is done outside the courtroom, in private offices, by phone or online.

Disadvantages of ADR

- **Costs:** If the parties do not resolve their dispute, they may have to pay for ADR, litigation, and trial.
- **No Public Trial:** ADR does not provide a public trial or a decision by a judge or jury.

Main Types of ADR

1. **Negotiation:** Parties often talk with each other in person, or by phone or online about resolving their case with a settlement agreement instead of a trial. If the parties have lawyers, they will negotiate for their clients.
2. **Mediation:** In mediation, a neutral mediator listens to each person's concerns, helps them evaluate the strengths and weaknesses of their case, and works with them to try to create a settlement agreement that is acceptable to all. Mediators do not decide the outcome. Parties may go to trial if they decide not to settle.

Mediation may be appropriate when the parties

- want to work out a solution but need help from a neutral person.
- have communication problems or strong emotions that interfere with resolution.

Mediation may not be appropriate when the parties

- want a public trial and want a judge or jury to decide the outcome.
- lack equal bargaining power or have a history of physical/emotional abuse.

How to Arrange Mediation in Los Angeles County

Mediation for **civil cases** is voluntary and parties may select any mediator they wish. Options include:

a. **The Civil Mediation Vendor Resource List**

If all parties in an active civil case agree to mediation, they may contact these organizations to request a "Resource List Mediation" for mediation at reduced cost or no cost (for selected cases).

- **ADR Services, Inc.** Case Manager Elizabeth Sanchez, elizabeth@adrservices.com (949) 863-9800
- **Mediation Center of Los Angeles** Program Manager info@mediationLA.org (833) 476-9145

These organizations cannot accept every case and they may decline cases at their discretion. They may offer online mediation by video conference for cases they accept. Before contacting these organizations, review important information and FAQs at www.lacourt.org/ADR.Res.List

NOTE: The Civil Mediation Vendor Resource List program does not accept family law, probate or small claims cases.

b. **Los Angeles County Dispute Resolution Programs**

<https://hrc.lacounty.gov/wp-content/uploads/2020/05/DRP-Fact-Sheet-23October19-Current-as-of-October-2019-1.pdf>

Day of trial mediation programs have been paused until further notice.

Online Dispute Resolution (ODR). Parties in small claims and unlawful detainer (eviction) cases should carefully review the Notice and other information they may receive about (ODR) requirements for their case.

c. Mediators and ADR and Bar organizations that provide mediation may be found on the internet.

3. Arbitration: Arbitration is less formal than trial, but like trial, the parties present evidence and arguments to the person who decides the outcome. In "binding" arbitration, the arbitrator's decision is final; there is no right to trial. In "nonbinding" arbitration, any party can request a trial after the arbitrator's decision. For more information about arbitration, visit <http://www.courts.ca.gov/programs-adr.htm>

4. Mandatory Settlement Conferences (MSC): MSCs are ordered by the Court and are often held close to the trial date or on the day of trial. The parties and their attorneys meet with a judge or settlement officer who does not make a decision but who instead assists the parties in evaluating the strengths and weaknesses of the case and in negotiating a settlement. For information about the Court's MSC programs for civil cases, visit <http://www.lacourt.org/division/civil/C10047.aspx>

Los Angeles Superior Court ADR website: <http://www.lacourt.org/division/civil/C10109.aspx>
For general information and videos about ADR, visit <http://www.courts.ca.gov/programs-adr.htm>

SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES		FILED Superior Court of California County of Los Angeles 08/15/2022 Sherri R. Carter, Executive Officer / Clerk of Court By: <u>R. Perez</u> Deputy
COURTHOUSE ADDRESS: Spring Street Courthouse 312 North Spring Street, Los Angeles, CA 90012		
NOTICE OF CASE ASSIGNMENT - UNLIMITED PERSONAL INJURY CIVIL CASES ASSIGNED TO THE PERSONAL INJURY HUB COURTS		
Your case is assigned to the judicial officer indicated below in the Personal Injury Hub Court for all purposes, except for trial.		CASE NUMBER: 22STCV26366

THIS FORM IS TO BE SERVED WITH THE SUMMONS AND COMPLAINT

ASSIGNED JUDICIAL OFFICER		DEPT.
✓	Audra Mori	31

<u>FINAL STATUS CONFERENCE:</u> DATE: <u>01/29/2024</u> at 10:00 a.m.
<u>TRIAL DATE:</u> DATE: <u>02/13/2024</u> at 8:30 a.m.
<u>ORDER TO SHOW CAUSE RE: DISMISSAL (Code of Civil Procedure, section 583.210)</u> DATE: <u>08/12/2024</u> at 8:30 a.m.

Given to the Plaintiff / Attorney of Record

On 08/16/2022
(Date)

Sherri R. Carter, Executive Officer / Clerk of Court

By R. Perez Deputy Clerk

NOTICE OF CASE ASSIGNMENT – UNLIMITED CIVIL PERSONAL INJURY CASES

LASC CIV 295 NEW 05/22
For Mandatory Use

INSTRUCTIONS FOR HANDLING UNLIMITED PERSONAL INJURY CIVIL CASES

The following critical provisions of the California Rules of Court, Title 3, Division 7, as applicable in the Superior Court are summarized for your assistance.

APPLICATION

The Division 7 Rules were effective January 1, 2007. They apply to all general civil cases.

PRIORITY OVER OTHER RULES

The Division 7 Rules shall have priority over all other Local Rules to the extent the others are inconsistent.

CHALLENGE TO ASSIGNED JUDICIAL OFFICER

A challenge under Code of Civil Procedure Section 170.6 must be made within 15 days after notice of assignment for all purpose to a judicial officer, or if a party has not yet appeared, within 15 days of the first appearance.

TIME STANDARDS

Cases assignment to the Personal Injury Hub Courts will be subjected to processing under the standards listed below.

COMPLAINTS

All complaints shall be served within 60 days of filing and proof of service shall be filed within 90 days. Failure to do so may result in the imposition of sanctions.

CROSS-COMPLAINTS

Without leave of court first being obtained, no cross-complaint may be filed by any party after their answer is filed. Cross-complaints shall be served within 30 days of the filing date and a proof of service filed within 60 days of the filing date.

FINAL STATUS CONFERENCE

The Court will require the parties to attend a final status conference not more than eight court days before the scheduled trial date. All parties shall have motions in limine, bifurcation motions, statements of major evidentiary issues, dispositive motions, requested form jury instructions, special jury instructions, and special jury verdicts timely filed and served prior to the conference. These matters may be heard and resolved at this conference. At least five days before this conference, counsel must also have exchanged lists of exhibits and witnesses and have submitted to the court a brief statement of the case to be read to the jury panel as required by Chapter Three of the Los Angeles Superior Court Rules.

SANCTIONS

The court will impose appropriate sanctions for the failure or refusal to comply with Chapter Three Rules, orders made by the Court and time standards, or deadlines established by the Court or by Chapter Three Rules. Such sanctions may be on a party, or if appropriate on counsel for a party.

This is not a complete delineation of the Division 7 or Chapter Three Rules, and adherence only to the above provisions is therefore not a guarantee against the imposition of sanctions under Trial Court Delay Reduction. Careful reading and compliance with the actual Chapter Rules is imperative.

Class Actions

Pursuant to Local Rule 2.3, all class actions shall be filed at the Stanley Mosk Courthouse and are randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be a class action it will be returned to a PI Hub Court for all purposes except for trial or an Independent Calendar Courtroom for all purposes depending on the PI Case Type.

***Provisionally Complex Cases**

Cases filed as provisionally complex are initially assigned to the Supervising Judge of complex litigation for determination of complex status. If the case is deemed to be complex within the meaning of California Rules of Court 3.400 et seq., it will be randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be complex, it will be returned to a PI Hub Court for all purposes except for trial or an Independent Calendar Courtroom for all purposes depending on the PI Case Type.

NOTICE OF CASE ASSIGNMENT – UNLIMITED CIVIL PERSONAL INJURY CASES

VOLUNTARY EFFICIENT LITIGATION STIPULATIONS



Superior Court of California
County of Los Angeles

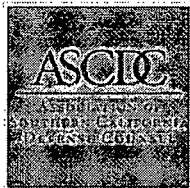


Los Angeles County
Bar Association
Litigation Section

Los Angeles County
Bar Association Labor and
Employment Law Section



Consumer Attorneys
Association of Los Angeles



Southern California
Defense Counsel



Association of
Business Trial Lawyers



California Employment
Lawyers Association

The Early Organizational Meeting Stipulation, Discovery Resolution Stipulation, and Motions in Limine Stipulation are voluntary stipulations entered into by the parties. The parties may enter into one, two, or all three of the stipulations; however, they may not alter the stipulations as written, because the Court wants to ensure uniformity of application. These stipulations are meant to encourage cooperation between the parties and to assist in resolving issues in a manner that promotes economic case resolution and judicial efficiency.

The following organizations endorse the goal of promoting efficiency in litigation and ask that counsel consider using these stipulations as a voluntary way to promote communications and procedures among counsel and with the court to fairly resolve issues in their cases.

◆ Los Angeles County Bar Association Litigation Section ◆

◆ Los Angeles County Bar Association
Labor and Employment Law Section ◆

◆ Consumer Attorneys Association of Los Angeles ◆

◆ Southern California Defense Counsel ◆

◆ Association of Business Trial Lawyers ◆

◆ California Employment Lawyers Association ◆

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:		STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.:		FAX NO. (Optional):	
E-MAIL ADDRESS (Optional):			
ATTORNEY FOR (Name):			
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES			
COURTHOUSE ADDRESS:			
PLAINTIFF:			
DEFENDANT:			
STIPULATION – EARLY ORGANIZATIONAL MEETING			CASE NUMBER:

This stipulation is intended to encourage cooperation among the parties at an early stage in the litigation and to assist the parties in efficient case resolution.

The parties agree that:

1. The parties commit to conduct an initial conference (in-person or via teleconference or via videoconference) within 15 days from the date this stipulation is signed, *to discuss and consider whether there can be agreement on the following:*
 - a. Are motions to challenge the pleadings necessary? If the issue can be resolved by amendment as of right, or if the Court would allow leave to amend, could an amended complaint resolve most or all of the issues a demurrer might otherwise raise? If so, the parties agree to work through pleading issues so that a demurrer need only raise issues they cannot resolve. Is the issue that the defendant seeks to raise amenable to resolution on demurrer, or would some other type of motion be preferable? Could a voluntary targeted exchange of documents or information by any party cure an uncertainty in the pleadings?
 - b. Initial mutual exchanges of documents at the "core" of the litigation. (For example, in an employment case, the employment records, personnel file and documents relating to the conduct in question could be considered "core." In a personal injury case, an incident or police report, medical records, and repair or maintenance records could be considered "core.");
 - c. Exchange of names and contact information of witnesses;
 - d. Any insurance agreement that may be available to satisfy part or all of a judgment, or to indemnify or reimburse for payments made to satisfy a judgment;
 - e. Exchange of any other information that might be helpful to facilitate understanding, handling, or resolution of the case in a manner that preserves objections or privileges by agreement;
 - f. Controlling issues of law that, if resolved early, will promote efficiency and economy in other phases of the case. Also, when and how such issues can be presented to the Court;
 - g. Whether or when the case should be scheduled with a settlement officer, what discovery or court ruling on legal issues is reasonably required to make settlement discussions meaningful, and whether the parties wish to use a sitting judge or a private mediator or other options as

SHORT TITLE:	CASE NUMBER:
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discussed in the "Alternative Dispute Resolution (ADR) Information Package" served with the complaint;

- h. Computation of damages, including documents, not privileged or protected from disclosure, on which such computation is based;
 - i. Whether the case is suitable for the Expedited Jury Trial procedures (see information at www.lacourt.org under "Civil" and then under "General Information").
2. The time for a defending party to respond to a complaint or cross-complaint will be extended to _____ (INSERT DATE) for the complaint, and _____ (INSERT DATE) for the cross-complaint, which is comprised of the 30 days to respond under Government Code § 68616(b), and the 30 days permitted by Code of Civil Procedure section 1054(a), good cause having been found by the Civil Supervising Judge due to the case management benefits provided by this Stipulation. A copy of the General Order can be found at www.lacourt.org under "Civil", click on "General Information", then click on "Voluntary Efficient Litigation Stipulations".
 3. The parties will prepare a joint report titled "Joint Status Report Pursuant to Initial Conference and Early Organizational Meeting Stipulation, and if desired, a proposed order summarizing results of their meet and confer and advising the Court of any way it may assist the parties' efficient conduct or resolution of the case. The parties shall attach the Joint Status Report to the Case Management Conference statement, and file the documents when the CMC statement is due.
 4. References to "days" mean calendar days, unless otherwise noted. If the date for performing any act pursuant to this stipulation falls on a Saturday, Sunday or Court holiday, then the time for performing that act shall be extended to the next Court day

The following parties stipulate:

Date:

_____	>	_____
(TYPE OR PRINT NAME)		(ATTORNEY FOR PLAINTIFF)
Date:		
_____	>	_____
(TYPE OR PRINT NAME)		(ATTORNEY FOR DEFENDANT)
Date:		
_____	>	_____
(TYPE OR PRINT NAME)		(ATTORNEY FOR DEFENDANT)
Date:		
_____	>	_____
(TYPE OR PRINT NAME)		(ATTORNEY FOR DEFENDANT)
Date:		
_____	>	_____
(TYPE OR PRINT NAME)		(ATTORNEY FOR _____)
Date:		
_____	>	_____
(TYPE OR PRINT NAME)		(ATTORNEY FOR _____)
Date:		
_____	>	_____
(TYPE OR PRINT NAME)		(ATTORNEY FOR _____)

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:		STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.: E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):		FAX NO. (Optional):	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES			
COURTHOUSE ADDRESS:			
PLAINTIFF:			
DEFENDANT:			CASE NUMBER:
STIPULATION – DISCOVERY RESOLUTION			

This stipulation is intended to provide a fast and informal resolution of discovery issues through limited paperwork and an informal conference with the Court to aid in the resolution of the issues.

The parties agree that:

1. Prior to the discovery cut-off in this action, no discovery motion shall be filed or heard unless the moving party first makes a written request for an Informal Discovery Conference pursuant to the terms of this stipulation.
2. At the Informal Discovery Conference the Court will consider the dispute presented by parties and determine whether it can be resolved informally. Nothing set forth herein will preclude a party from making a record at the conclusion of an Informal Discovery Conference, either orally or in writing.
3. Following a reasonable and good faith attempt at an informal resolution of each issue to be presented, a party may request an Informal Discovery Conference pursuant to the following procedures:
 - a. The party requesting the Informal Discovery Conference will:
 - i. File a Request for Informal Discovery Conference with the clerk's office on the approved form (copy attached) and deliver a courtesy, conformed copy to the assigned department;
 - ii. Include a brief summary of the dispute and specify the relief requested; and
 - iii. Serve the opposing party pursuant to any authorized or agreed method of service that ensures that the opposing party receives the Request for Informal Discovery Conference no later than the next court day following the filing.
 - b. Any Answer to a Request for Informal Discovery Conference must:
 - i. Also be filed on the approved form (copy attached);
 - ii. Include a brief summary of why the requested relief should be denied;

SHORT TITLE:	CASE NUMBER:
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- iii. Be filed within two (2) court days of receipt of the Request; and
 - iv. Be served on the opposing party pursuant to any authorized or agreed upon method of service that ensures that the opposing party receives the Answer no later than the next court day following the filing.
- c. No other pleadings, including but not limited to exhibits, declarations, or attachments, will be accepted.
- d. If the Court has not granted or denied the Request for Informal Discovery Conference within ten (10) days following the filing of the Request, then it shall be deemed to have been denied. If the Court acts on the Request, the parties will be notified whether the Request for Informal Discovery Conference has been granted or denied and, if granted, the date and time of the Informal Discovery Conference, which must be within twenty (20) days of the filing of the Request for Informal Discovery Conference.
- e. If the conference is not held within twenty (20) days of the filing of the Request for Informal Discovery Conference, unless extended by agreement of the parties and the Court, then the Request for the Informal Discovery Conference shall be deemed to have been denied at that time.
4. If (a) the Court has denied a conference or (b) one of the time deadlines above has expired without the Court having acted or (c) the Informal Discovery Conference is concluded without resolving the dispute, then a party may file a discovery motion to address unresolved issues.
5. The parties hereby further agree that the time for making a motion to compel or other discovery motion is tolled from the date of filing of the Request for Informal Discovery Conference until (a) the request is denied or deemed denied or (b) twenty (20) days after the filing of the Request for Informal Discovery Conference, whichever is earlier, unless extended by Order of the Court.
- It is the understanding and intent of the parties that this stipulation shall, for each discovery dispute to which it applies, constitute a writing memorializing a "specific later date to which the propounding [or demanding or requesting] party and the responding party have agreed in writing," within the meaning of Code Civil Procedure sections 2030.300(c), 2031.320(c), and 2033.290(c).
6. Nothing herein will preclude any party from applying *ex parte* for appropriate relief, including an order shortening time for a motion to be heard concerning discovery.
7. Any party may terminate this stipulation by giving twenty-one (21) days notice of intent to terminate the stipulation.
8. References to "days" mean calendar days, unless otherwise noted. If the date for performing any act pursuant to this stipulation falls on a Saturday, Sunday or Court holiday, then the time for performing that act shall be extended to the next Court day.

SHORT TITLE:	CASE NUMBER:
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The following parties stipulate:

Date:		➤	
	(TYPE OR PRINT NAME)		(ATTORNEY FOR PLAINTIFF)
Date:		➤	
	(TYPE OR PRINT NAME)		(ATTORNEY FOR DEFENDANT)
Date:		➤	
	(TYPE OR PRINT NAME)		(ATTORNEY FOR DEFENDANT)
Date:		➤	
	(TYPE OR PRINT NAME)		(ATTORNEY FOR DEFENDANT)
Date:		➤	
	(TYPE OR PRINT NAME)		(ATTORNEY FOR _____)
Date:		➤	
	(TYPE OR PRINT NAME)		(ATTORNEY FOR _____)
Date:		➤	
	(TYPE OR PRINT NAME)		(ATTORNEY FOR _____)

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:		STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.:		FAX NO. (Optional):	
E-MAIL ADDRESS (Optional):			
ATTORNEY FOR (Name):			
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES			
COURTHOUSE ADDRESS:			
PLAINTIFF:			
DEFENDANT:			
INFORMAL DISCOVERY CONFERENCE (pursuant to the Discovery Resolution Stipulation of the parties)			CASE NUMBER:

1. This document relates to:

- ☐ Request for Informal Discovery Conference
☐ Answer to Request for Informal Discovery Conference

2. Deadline for Court to decide on Request: _____ (insert date 10 calendar days following filing of the Request).

3. Deadline for Court to hold Informal Discovery Conference: _____ (insert date 20 calendar days following filing of the Request).

4. For a Request for Informal Discovery Conference, briefly describe the nature of the discovery dispute, including the facts and legal arguments at issue. For an Answer to Request for Informal Discovery Conference, briefly describe why the Court should deny the requested discovery, including the facts and legal arguments at issue.

NAME AND ADDRESS OF ATTORNEY OR PARTY WITHOUT ATTORNEY:		STATE BAR NUMBER	Reserved for Clerk's File Stamp
TELEPHONE NO.: E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):		FAX NO. (Optional):	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES			
COURTHOUSE ADDRESS:			
PLAINTIFF:			
DEFENDANT:			CASE NUMBER:
STIPULATION AND ORDER – MOTIONS IN LIMINE			

This stipulation is intended to provide fast and informal resolution of evidentiary issues through diligent efforts to define and discuss such issues and limit paperwork.

The parties agree that:

1. At least ____ days before the final status conference, each party will provide all other parties with a list containing a one paragraph explanation of each proposed motion in limine. Each one paragraph explanation must identify the substance of a single proposed motion in limine and the grounds for the proposed motion.
2. The parties thereafter will meet and confer, either in person or via teleconference or videoconference, concerning all proposed motions in limine. In that meet and confer, the parties will determine:
 - a. Whether the parties can stipulate to any of the proposed motions. If the parties so stipulate, they may file a stipulation and proposed order with the Court.
 - b. Whether any of the proposed motions can be briefed and submitted by means of a short joint statement of issues. For each motion which can be addressed by a short joint statement of issues, a short joint statement of issues must be filed with the Court 10 days prior to the final status conference. Each side's portion of the short joint statement of issues may not exceed three pages. The parties will meet and confer to agree on a date and manner for exchanging the parties' respective portions of the short joint statement of issues and the process for filing the short joint statement of issues.
3. All proposed motions in limine that are not either the subject of a stipulation or briefed via a short joint statement of issues will be briefed and filed in accordance with the California Rules of Court and the Los Angeles Superior Court Rules.

SHORT TITLE:	CASE NUMBER:
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The following parties stipulate:

Date:		➤	
	(TYPE OR PRINT NAME)		(ATTORNEY FOR PLAINTIFF)
Date:		➤	
	(TYPE OR PRINT NAME)		(ATTORNEY FOR DEFENDANT)
Date:		➤	
	(TYPE OR PRINT NAME)		(ATTORNEY FOR DEFENDANT)
Date:		➤	
	(TYPE OR PRINT NAME)		(ATTORNEY FOR DEFENDANT)
Date:		➤	
	(TYPE OR PRINT NAME)		(ATTORNEY FOR _____)
Date:		➤	
	(TYPE OR PRINT NAME)		(ATTORNEY FOR _____)
Date:		➤	
	(TYPE OR PRINT NAME)		(ATTORNEY FOR _____)

THE COURT SO ORDERS.

Date:			
			JUDICIAL OFFICER

Print	Save	Clear
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FILED
LOS ANGELES SUPERIOR COURT

MAY 11 2011

JOHN A. CLARKE, CLERK
N. Navarro
BY NANCY NAVARRO, DEPUTY

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

General Order Re)	ORDER PURSUANT TO CCP 1054(a),
Use of Voluntary Efficient Litigation)	EXTENDING TIME TO RESPOND BY
Stipulations)	30 DAYS WHEN PARTIES AGREE
)	TO EARLY ORGANIZATIONAL
)	MEETING STIPULATION

Whereas the Los Angeles Superior Court and the Executive Committee of the Litigation Section of the Los Angeles County Bar Association have cooperated in drafting "Voluntary Efficient Litigation Stipulations" and in proposing the stipulations for use in general jurisdiction civil litigation in Los Angeles County;

Whereas the Los Angeles County Bar Association Litigation Section; the Los Angeles County Bar Association Labor and Employment Law Section; the Consumer Attorneys Association of Los Angeles; the Association of Southern California Defense Counsel; the Association of Business Trial Lawyers of Los Angeles; and the California Employment Lawyers Association all "endorse the goal of promoting efficiency in litigation, and ask that counsel consider using these stipulations as a voluntary way to promote communications and procedures among counsel and with the court to fairly resolve issues in their cases;"

1 Whereas the Early Organizational Meeting Stipulation is intended to encourage
2 cooperation among the parties at an early stage in litigation in order to achieve
3 litigation efficiencies;

4 Whereas it is intended that use of the Early Organizational Meeting Stipulation
5 will promote economic case resolution and judicial efficiency;

6 Whereas, in order to promote a meaningful discussion of pleading issues at the
7 Early Organizational Meeting and potentially to reduce the need for motions to
8 challenge the pleadings, it is necessary to allow additional time to conduct the Early
9 Organizational Meeting before the time to respond to a complaint or cross complaint
10 has expired;

11 Whereas Code of Civil Procedure section 1054(a) allows a judge of the court in
12 which an action is pending to extend for not more than 30 days the time to respond to
13 a pleading "upon good cause shown";

14 Now, therefore, this Court hereby finds that there is good cause to extend for 30
15 days the time to respond to a complaint or to a cross complaint in any action in which
16 the parties have entered into the Early Organizational Meeting Stipulation. This finding
17 of good cause is based on the anticipated judicial efficiency and benefits of economic
18 case resolution that the Early Organizational Meeting Stipulation is intended to
19 promote.

20 IT IS HEREBY ORDERED that, in any case in which the parties have entered
21 into an Early Organizational Meeting Stipulation, the time for a defending party to
22 respond to a complaint or cross complaint shall be extended by the 30 days permitted
23

1 by Code of Civil Procedure section 1054(a) without further need of a specific court
2 order.

3
4 DATED: May 11, 2011

Carolyn B. Kuhl
Carolyn B. Kuhl, Supervising Judge of the
Civil Departments, Los Angeles Superior Court

2022-SJ-008-02

FILED
Superior Court of California
County of Los Angeles

MAY 04 2022

Sherri R. Carter, Executive Officer/Clerk
By Anoush Achitarian, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT

In re Personal Injury Cases Assigned to the) SEVENTH AMENDED STANDING
Personal Injury Hub Courts (Spring Street) ORDER FOR PROCEDURES IN THE
Courthouse)) PERSONAL INJURY HUB COURTS
) EFFECTIVE MAY 16, 2022 (REVISED
) 05/04/2022)

STANDING ORDER RE: PROCEDURES AT PERSONAL INJURY

HUB COURTS AT THE SPRING STREET COURTHOUSE

The Superior Court of California, in and for the County of Los Angeles (Superior Court, Los Angeles County), hereby issues the following order prescribing the procedures to be followed in the Personal Injury Hub Courts at the Spring Street Courthouse.

1. Authority

This order is being made pursuant to the Code of Civil Procedure, the California Rules of Court, rule 3.720, and the Superior Court, Los Angeles County, Local Rules, rule 3.23. It supersedes the following General and Standing Orders:

A. Amended General Order Re: General Jurisdiction Personal Injury Cases – Filing

Location (5/16/2014);

B. First Amended Standing Order Re: Final Status Conference, Personal Injury

("PI") Courts (4/16/2018);

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**SEVENTH AMENDED STANDING ORDER FOR PROCEDURES IN
THE PERSONAL INJURY HUB COURT**

2022-SJ-008-02

1 First Amended Standing Order Re: Personal Injury Procedures at the Spring
2 Street Courthouse (2/24/2020);

3 C. Third Amended Standing Order Re: Final Status Conference, Personal Injury
4 ("PI") Courts (2/24/2020);

5 D. Fifth Amended Standing Order Re: Mandatory Settlement Conference (2/24/20);

6 E. Amended Supplemental Standing Order re Covid Protective Measures Related to
7 Final Status Conferences in Personal Injury Cases at the Spring Street Courthouse
8 (12/22/2020);

9 F. Sixth Amended Standing Order Re: Mandatory Settlement Conference (6/23/21);
10 and

11 G. Second Amended Supplemental Standing Order re Covid Protective Measures
12 Related to Final Status Conferences in Personal Injury Cases at the Spring Street
13 Courthouse (10/08/2021).

14 **2. Definition of Personal Injury (PI) Cases**

15 As prescribed by the Superior Court, Los Angeles County, Local Rules, rule 2.3(a)(1)(A),
16 "personal injury" cases are those alleging injuries arising from:

17 ☐ 2201 Motor Vehicle – Personal Injury/Property Damage/Wrongful Death

18 ☐ 4601 Uninsured Motorist – Personal Injury/Property Damage/Wrongful Death

19 ☐ 2301 Premises Liability (e.g., dangerous conditions of property, slip/trip and fall,
20 dog attack, etc.)

21 ☐ 2302 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault,
22 battery, vandalism, etc.)

23 ☐ 2303 Intentional Infliction of Emotional Distress

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SEVENTH AMENDED STANDING ORDER FOR PROCEDURES IN
THE PERSONAL INJURY HUB COURT

2022-SJ-008-02

☐ 2304 Other Personal Injury/Property Damage/Wrongful Death

☐ 2307 Construction Accidents

The Superior Court, Los Angeles County, will assign a case to the PI Hub Courts if plaintiff(s) checks any of the above boxes on the Civil Case Cover Sheet Addendum and Statement of Location (Form LASC CIV 109).

However, cases alleging causes of action for product liability, medical or health professional malpractice, elder abuse, sexual abuse, and habitability issues **will not** be assigned to the PI Hub Courts. If any of the following boxes are checked on the Civil Case Cover Sheet Addendum and Statement of Location, the case will be assigned to an Independent Calendar Court:

☐ 2401 Product Liability (not asbestos or toxic/environmental)

☐ 2402 Product Liability – Song-Beverly Consumer Warranty Act (Civil Code, sections 1790-1795.8) (Lemon Law)

☐ 2305 Elder/Dependent Adult Abuse and Claims Against Skilled Nursing Facility

☐ 2306 Intentional Conduct - Sexual Abuse Case (in any form)

☐ 2308 Landlord - Tenant Habitability (e.g., bed bugs, mold, etc.)

☐ 4501 Medical Malpractice - Physicians & Surgeons

☐ 4502 Other Professional Health Care Malpractice

Independent Calendar Courts will handle such cases for all purposes, including trial.

3. Assignment to PI Hub Court and Final Status Conference, Trial, and Order to Show

Cause Dates

All PI cases filed in Los Angeles County (with the exception of those filed in the Michael Antonovich Antelope Valley Courthouse) will be assigned to a PI Hub Court located at 312

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SEVENTH AMENDED STANDING ORDER FOR PROCEDURES IN
THE PERSONAL INJURY HUB COURT

2022-SJ-008-02

1 North Spring Street, Los Angeles, CA 90012. In addition, upon filing, a case will be assigned a
2 Trial date approximately 18 months from the filing date, a Final Status Conference (FSC) date
3 approximately eight court days prior to the Trial date, and a date for a hearing on an Order to
4 Show Cause why the case should not be dismissed pursuant to Code of Civil Procedure sections
5 583.410 and 583.420(a)(1) approximately 24 months from the filing date.

6 **4. Transferring Cases from the PI Hub Courts**

7 The PI Hub Courts may transfer a case *sua sponte* based upon a determination that the
8 case is either not a PI case or that it requires more case management than the PI Hub Courts can
9 provide, given their case inventories.

10 **5. Filing of Documents**

11 Except for self-represented litigants or counsel who have obtained an exemption from
12 mandatory electronic filing, parties must electronically file documents. Filings are no longer
13 accepted via facsimile. The requirements for electronic filing are detailed in the Superior
14 Court, Los Angeles County's operative General Order Re Mandatory Electronic Filing for
15 Civil, available online at <https://www.lacourt.org/division/efiling/pdf/GenOrdCivilEfiling.pdf>.

16 **6. Service of Summons and Complaint**

17 Plaintiff(s) shall serve the summons and complaint upon Defendant(s) within 60 days of
18 filing of the complaint. (California Rules of Court, rule 3.110 (b).) Failure to do so may result
19 in the imposition of sanctions. (Code of Civil Procedure, sections 128, 177.5; California Rules
20 of Court, rule 2.30.) In addition, at a hearing on an Order to Show Cause re Dismissal (described
21 in Paragraph three above), the PI Hub Courts may dismiss the case and/or all unserved parties
22 unless Plaintiff(s) shows cause why the case or the unserved parties should not be dismissed.
23 (Code of Civil Procedure, sections 583.410, 583.420(a)(2).)

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SEVENTH AMENDED STANDING ORDER FOR PROCEDURES IN
THE PERSONAL INJURY HUB COURT

2022-SJ-008-02

7. Stipulations to Advance or Continue Trial

The Court may honor stipulations by all parties to a case to advance or continue a trial, provided that the proposed trial date is not beyond 24 months of the filing of the complaint, without a showing of good cause.

To advance or continue a trial date, the parties (or their counsel of record) should jointly execute and submit a (Proposed) Order and Stipulation to Continue Trial, FSC [and Related Motion/Discovery Dates Personal Injury Courts Only (Central District)] (LACIV-CTRL242). The PI Hub Courts schedule FSCs at 10:00 a.m., approximately eight court days before the trial date. Parties seeking to advance or continue trial and FSC dates shall file the stipulation at least eight court days before the existing FSC date. (Code of Civil Procedure, section 595.2; Government Code, section 70617(c)(2).) In selecting a new trial date, parties should avoid setting on Mondays, or Tuesdays following a court holiday.

Parties may submit a maximum of two stipulations to continue trial for a total continuance of six months before 24 months of the filing of the complaint. Other requests to continue trial will be granted only upon a showing of good cause by noticed motion.

8. No Case Management Conferences

The PI Hub Courts do not conduct case management conferences. Thus, the parties need not file a Case Management Conference Statement.

9. Law and Motion**A. Reservation Hearing Date**

Parties must reserve hearing dates for motions in the PI Hub Courts using the Court Reservation System (CRS) available online (www.lacourt.org). After reserving a motion hearing date, the reservation requestor must submit the moving papers for filing with the reservation

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SEVENTH AMENDED STANDING ORDER FOR PROCEDURES IN
THE PERSONAL INJURY HUB COURT

2022-SJ-008-02

1 receipt number printed on the face page of the document under the caption and attach the
2 reservation receipt as the last page. Parties or counsel who are unable to utilize the online CRS
3 to reserve a hearing date may contact the assigned PI Hub Court for assistance, Monday through
4 Friday, between 3:00 p.m. and 4:00 p.m.

5 As soon as a reservation requestor realizes that a motion hearing, or other proceeding
6 requiring a reservation in the PI Hub Courts, such as in Informal Discovery Conference (IDC)
7 will not be necessary, the reservation requestor shall immediately use CRS to cancel the
8 reservation for the motion hearing, or other proceeding requiring a reservation.

9 If the moving party deems the hearing date to be too far in the future (for example, after
10 the trial date), parties should check CRS from time to time because earlier hearing dates may
11 become available as cases settle or hearings are taken off calendar. The Court will not advance
12 a hearing date because it is set after a trial date. If a hearing is set after the trial date, the moving
13 party should seek to continue the trial, by noticed motion, instead. (See, Section 10. Ex Parte
14 Applications, below.)

15 B. Electronically Filed Documents

16 Any and all electronically filed documents must be text searchable and bookmarked
17 pursuant to the operative General Order re Mandatory Electronic Filing for Civil, General Order
18 re Mandatory Electronic Filing in Civil.

19 C. Courtesy Copies

20 Courtesy copies are required for Ex Parte Applications, Motions for Summary Judgment,
21 Oppositions to Ex Parte Applications and Motions for, Oppositions to, and Replies to
22 Oppositions to Motions for Summary Judgment or Summary Adjudication.

23 ///

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SEVENTH AMENDED STANDING ORDER FOR PROCEDURES IN
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1 Courtesy copies must be submitted directly to the assigned PI Hub Court at the Spring
2 Street Courthouse. The PI Hub Courts strongly encourage the parties filing and opposing lengthy
3 motions for summary judgment or adjudication, to submit one or more three-ring binders
4 organizing the courtesy copies behind tabs. Any courtesy copies of documents with declarations
5 and/or exhibits must be tabbed. (California Rules of Court, rule 3.1110(f).) All deposition
6 excerpts referenced in briefs must be marked on the transcripts attached as exhibits. (California
7 Rules of Court, rule 3.1116(c).) Courtesy copies, including any media attached thereto, will be
8 destroyed by the Court without notice following the hearing.

9 D. Withdrawal of Motions

10 If a moving party takes a motion off a PI Hub Court's calendar, the moving party must
11 notify the court immediately and should remove the item from the Court's calendar on CRS.
12 (California Rules of Court, rule 3.1304(b).) If, in response to a demurrer or a motion to strike,
13 a party exercises its right to amend a pleading as prescribed by Code of Civil Procedure section
14 472(a), the Court requests that party work with the party who filed the demurrer or motion to
15 strike to take the demurrer or motion to strike off calendar so that the PI Hub Courts do not
16 needlessly prepare tentative rulings.

17 E. Motions to Compel Further Responses to Discovery

18 PI Hub Courts will not hear Motions to Compel Further Discovery Responses to
19 Discovery until the parties have engaged in an Informal Discovery Conference (IDC).

20 PI Hub Courts may deny or continue a Motion to Compel Further Responses to
21 Discovery unless the parties have participated in an IDC before the scheduled hearing on a
22 motion to compel further discovery responses.

23 ///

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SEVENTH AMENDED STANDING ORDER FOR PROCEDURES IN
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1 After meeting and conferring about available dates for an IDC, the moving/propounding
2 party shall reserve an IDC through CRS (see paragraph 9 above) and provide notice of the
3 reserved IDC to the opposing/responding party by filing and serving an Informal Discovery
4 Conference Form for Personal Injury Courts LASC CIV 239 at least 15 court days before the
5 IDC and attach the CRS reservation receipt as the last page. **The IDC will not be “scheduled”**
6 **by the court until the IDC Form is filed.** The opposing/responding party may file and serve a
7 responsive IDC Form at least 10 court days before the IDC. All parties shall briefly set forth
8 their respective positions on the pending discovery issues on the IDC Form.

9 Ideally, the parties should participate in an IDC before a Motion to Compel Further
10 Discovery Responses is filed because the IDC may avoid the necessity of such a motion or, at
11 least, reduce its scope. Because of that possibility, parties are encouraged to stipulate to extend
12 the deadline for filing a Motion to Compel Further Discovery Responses by 60 days in order to
13 allow time to participate in an IDC and to informally resolve the pending discovery issues.

14 Note: Reserving or scheduling an IDC **does not extend the time to file a Motion to**
15 **Compel Further Discovery Responses.**

16 If parties do not stipulate to extend the deadline(s) to file a Motion to Compel Further
17 Discovery Responses, the moving/propounding party may file the motion to avoid it being
18 deemed untimely. However, the IDC must take place before the motion is heard so it is
19 suggested that the moving party reserve a date for the motion hearing that is at least 60 days after
20 the date when an IDC is scheduled. Note: A party's failure to stipulate to extend the time to
21 bring a Motion to Compel Further Discovery Responses so that an IDC may be held may subject
22 the parties and/or counsel to the imposition of sanctions.

23 ///

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1 The PI Hub Courts have found that, in most cases, IDCs are successful at assisting the
2 parties to amicably resolve their discovery disputes, and in resolving the case as a whole. The
3 purpose of the IDC is to assist the parties to resolve and/or narrow the scope of discovery
4 disputes. Therefore, parties, through their respective counsel of record with full authority to
5 make binding agreements, shall participate in the scheduled IDC. The PI Hub Courts have found
6 that most discovery disputes result from a failure to meaningfully meet and confer on the pending
7 discovery issues. The PI Hub Courts generally find that meeting and conferring by only
8 exchanging letters and e-mails, as opposed to actual conversation, are insufficient and
9 ineffective. Thus, in requesting an IDC, the parties must indicate on their IDC forms what efforts
10 were made to informally resolve pending discovery issues, which must include in-person or
11 virtual meetings or telephonic communications. (The PI Hub Courts require this same showing
12 in declarations filed in support of, and in opposition to, Motions to Compel Further Discovery
13 Responses.)

14 Time permitting, the PI Hub Courts may be available to conduct IDCs to resolve other
15 types of discovery disputes.

16 **10. Ex Parte Applications**

17 The PI Hub Courts will only grant ex parte relief upon a showing, by admissible
18 evidence, that the moving party will suffer "irreparable harm," "immediate danger," or where
19 the moving party identifies "a statutory basis for granting relief ex parte." (California Rules of
20 Court, rule 3.1202(c).) The PI Hub Courts have no capacity to hear multiple ex parte
21 applications or to shorten time to add hearings to their fully booked motion calendars. Given
22 the PI Hub Courts' impacted calendars, a PI Hub Court's unavailability for timely motion
23 hearings is not an "immediate danger" or threat of "irreparable harm" justifying ex parte relief.

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1 Instead of seeking ex parte relief, the moving party should reserve the earliest available motion
2 hearing date (even if it is after the scheduled trial date) and file a noticed motion to continue the
3 trial.

4 And, again, parties should check CRS from time to time because earlier hearing dates
5 may become available as cases settle or hearings are taken off calendar.

6 **11. Jury Fees**

7 Parties must pay jury fees no later than 365 calendar days after the filing of the initial
8 complaint. (Code of Civil Procedure, § 631(c)(2).)

9 **12. Final Status Conference**

10 **A. Purpose**

11 The purpose of the FSC is to verify that the parties are completely ready to proceed with
12 trial continuously and efficiently, from day to day, until verdict. The PI Hub Courts will verify
13 at the FSC that all parties have (1) prepared all necessary trial documents, and (2) met and
14 conferred in an effort to stipulate to ultimate facts, legal issues, Motions in Limine, and the
15 authentication/foundation and admissibility of exhibits.

16 **B. Trial Documents to Be Filed**

17 At least five calendar days prior to the FSC, the parties shall serve and file the following
18 Trial Readiness Documents:

19 **I. Trial Briefs (Optional)**

20 Each party may, but is not required to, file a trial brief succinctly identifying:

- 21 a. the claims and defenses subject to litigation;
- 22 b. the major legal issues (with supporting points and authorities);
- 23 c. the relief claimed and calculation of damages sought; and

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1 d. any other information that may assist the court at trial.

2 2. Motions in Limine

3 Before filing Motions in Limine, the parties shall comply with the statutory notice
4 provisions of Code of Civil Procedure section 1005 and the requirements of the Superior Court,
5 Los Angeles County, Local Rules, rule 3.57(a). The caption of each Motion in Limine shall
6 concisely identify the evidence that the moving party seeks to preclude. Parties filing more than
7 one Motion in Limine shall number them consecutively. Parties filing opposition and reply
8 documents shall identify the corresponding motion number in the caption.

9 3. Joint Statement to Be Read to the Jury

10 For jury trials, the parties shall prepare and file a joint written statement of the case for
11 the trial court to read to the jury. (Superior Court, Los Angeles County, Local Rules, rule
12 3.25(g)(4).)

13 4. Joint Witness List

14 The parties shall prepare and file a joint, alphabetized by last name, list of all witnesses
15 that each party intends to call, excluding impeachment and rebuttal witnesses. (Superior Court,
16 Los Angeles County, Local Rules, rule 3.25(g)(5).) The joint witness list shall identify each
17 witness by name, specify which witnesses are non-experts and experts, estimate the length of the
18 direct, cross, and re-direct examination of each witness, and include a total number of hours for
19 all witness testimony. The parties shall identify all potential witness scheduling issues and
20 special requirements. Any party who seeks to elicit testimony from a witness not identified on
21 the witness list must first make a showing of good cause to the trial court.

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1 5. List of Proposed Jury Instructions (Joint and Contested)

2 The parties shall jointly prepare and file a list of proposed jury instructions, organized in
3 numerical order, including columns to indicate whether an instruction is agreed to or contested.
4 In addition, the List of Proposed Jury Instructions must include columns for a trial judge to
5 indicate whether an instruction was given, given as modified, refused or withdrawn. (California
6 Rules of Court, rule 2.1055.)

7 6. Jury Instructions (Joint and Contested)

8 The parties shall prepare a complete set of full text proposed jury instructions in a format
9 ready for submission to the jury, by editing all proposed California Civil Jury Instructions
10 including inserting party name(s) and eliminating blanks, brackets, and irrelevant material. The
11 parties may prepare special instructions in a format ready for submission to the jury with the
12 instruction number, title, and text only (i.e., **there should be no boxes or other indication on**
13 **the printed instruction itself as to which party is requesting the instruction).**

14 7. Joint Verdict Form(s)

15 The parties shall prepare and jointly file a proposed general verdict form or special
16 verdict form (with interrogatories) acceptable to all parties. (Superior Court, Los Angeles
17 County, Local Rules, rule 3.25(g)(8).) If the parties cannot agree on a joint verdict form, each
18 party must separately file a proposed verdict form.

19 8. Joint Exhibit List

20 The parties shall prepare and file a joint exhibit list organized with columns identifying
21 each exhibit, setting forth stipulations, if any, to authenticity/foundation and admissibility of
22 exhibits, and specifying evidentiary objections, if any, to the admission of an exhibit. If an
23 objection to an exhibit is not articulated on the exhibit list, the trial court may deem the exhibit

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1 admitted. The parties shall meet and confer regarding stipulations to authenticity/foundation and
2 admissibility of exhibits, and to resolve objections, if any, to the admission of an exhibit, before
3 filing the Joint Exhibit List.

4 9. Page and Line Designation for Deposition and Former Testimony

5 If the parties intend to use deposition testimony or former trial testimony in lieu of any
6 witness' live testimony, the parties shall meet and confer, and jointly prepare and file a chart
7 with columns for each of the following: 1) the page and line designations of the deposition or
8 former testimony requested for use, 2) objections, 3) counter-designations, 4) any responses
9 thereto, and 5) the Court's ruling.

10 C. Items to be Presented at the Final Status Conference

11 I. Trial Binders

12 The parties shall jointly prepare (and be ready to temporarily lodge) 3-ring binders
13 containing conformed (filed in eCourt) copies of all the following:

14 Tab A: Trial Briefs (Optional)

15 Tab B: Motions in Limine

16 The parties shall organize Motions in Limine (tabbed in numerical order) with the
17 opposition papers and reply papers for each motion placed directly behind the moving
18 papers.

19 Tab C: Joint Statement to Be Read to the Jury

20 Tab D: Joint Witness List

21 Tab E: Joint List of Jury Instructions (identifying the agreed upon and contested
22 instructions)

23 Tab F: Joint and Contested Jury Instructions

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1 The parties shall organize proposed jury instructions with the agreed upon instructions
2 first in order followed by the contested instructions (including special instructions)
3 submitted by each party.

4 Tab G: Joint and/or Contested Verdict Form(s)

5 Tab H: Joint Exhibit List

6 Tab I: Joint Chart of Page and Line Designation(s) for Deposition and Former Testimony

7 Tab J: Copies of the Current Operative Pleadings (including the operative complaint,
8 answer, cross-complaint, if any, and answer to any cross-complaint).

9 2. Filing and Electronic Submission of Trial Documents

10 In an effort to reduce the number of in-person appearances in the PI Hub Courts, in
11 addition to the parties filing and serving the Trial Documents at least five calendar days prior to
12 the FSC, two court days prior to the FSC, the parties must provide the PI Hub Court with the
13 trial binders in electronic form (see below). This will allow parties to appear remotely for the
14 FSC and provide the PI Hub Courts with the opportunity to review the trial binders to determine
15 whether parties are ready for trial. Hard copies of the trial binders will continue to be required
16 for the trial.

17 a. The parties must submit in one PDF conformed copies of the joint statement of the
18 case, joint witness list, joint list of jury instructions, full-text joint and contested jury
19 instructions, joint and/or contested verdict form(s), joint exhibit list, joint deposition
20 designation chart, and operative pleadings as listed in paragraph C.1. above (Tabs C
21 through J).

22 b. The trial briefs and Motions in Limine, oppositions, and replies, if any, must be
23 submitted in a separate PDF as listed in paragraph C.1 above (Tabs A and B). If a

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1 **Motion in Limine and exhibits thereto exceed 10 pages, the parties may submit**
2 **just the face page of the motion.** (The entire motion will still need to be brought to
3 the trial in the appropriate binder.)

- 4 c. The PDFs must be text searchable.
- 5 d. The PDFs must be bookmarked which is essentially an electronic tab so that the PI
6 Hub Court is able to find and navigate among the trial documents.

7 (See [https://helpx.adobe.com/acrobat/using/page-thumbnails-bookmarks-](https://helpx.adobe.com/acrobat/using/page-thumbnails-bookmarks-pdfs.html)
8 [pdfs.html](https://helpx.adobe.com/acrobat/using/page-thumbnails-bookmarks-pdfs.html) for bookmarking instructions.)

- 9 e. The PDFs must be emailed to the applicable email address listed below:

10 Department 27 at sscdept27FSC@LACourt.org

11 Department 28 at sscdept28FSC@LACourt.org

12 Department 29 at sscdept29FSC@LACourt.org

13 Department 30 at sscdept30FSC@LACourt.org

14 Department 31 at sscdept31FSC@LACourt.org

15 Department 32 at sscdept32FSC@LACourt.org

- 16 f. The subject line in the email must include identifying case information as follows:

17 [Insert Case Number] Trial Readiness Binder, FSC, [Insert MM/DD/YEAR of
18 Hearing Date] (e.g., 20STCV00001 Trial Readiness Binder, FSC 01/11/2022).

- 19 g. Each email should have two PDFs attached – one containing the trial documents and
20 the other containing the trial briefs and Motions in Limine, if applicable.

- 21 h. The parties need not email the evidentiary exhibit binders to the PI Hub Court for the
22 FSC. However, the parties shall prepare the exhibit binders as required (see section
23 3. Evidentiary Exhibits, below) and be prepared to represent to the PI Hub Court that

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1 the binders have been properly prepared. Hard copies of the exhibit binders will be
2 required for the trial court.

3 3. Evidentiary Exhibits

4 The parties shall jointly prepare (and be ready to temporarily lodge for inspection at the
5 FSC) three sets of tabbed, internally paginated by document, and properly marked exhibits,
6 organized numerically in three-ring binders (a set for the trial court, the Judicial Assistant, and
7 the witnesses). The parties shall mark all non-documentary exhibits and insert a simple written
8 description of the exhibit behind the corresponding numerical tab in the exhibit binder.

9 D. Failure To Comply with Final Status Conference Obligations

10 The PI Hub Courts have the discretion to require any party or counsel of record who fails or
11 refuses to comply with this Standing Order to show cause why the Court should not impose
12 monetary, evidentiary, and/or issue sanctions (including the entry of a default or the striking of
13 an answer).

14 13. Mandatory Settlement Conferences

15 Mandatory Settlement Conferences (MSC) are available on a virtual platform hosted by
16 the Beverly Hills Bar Association at ResolveLawLA.com. MSCs are conducted by volunteer
17 attorneys from the American Board of Trial Advocates, the Association of Southern California
18 Defense Counsel, the Consumer Attorneys Association of Los Angeles, and the Beverly Hills
19 Bar Association and are overseen by the Court.

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1 MSCs are available in cases with two sides¹ 1) by stipulation, or 2) by court order at the
2 Final Status Conference. If parties stipulate to participate in a ResolveLawLA MSC, they must
3 seek leave of Court to do so, by making an ex parte application using the PI Hub MSC
4 Stipulation form. Both parties should appear at the ex parte hearing. At the Final Status
5 Conference, the Court may order parties to participate in a MSC if the Court feels that it could
6 assist the parties in resolving the case.

7 Whether by stipulation or court order, parties must access the ResolveLawLA website
8 at www.ResolveLawLA.com to create an account and register the case for MSC within two court
9 days of the Court's order of the MSC. Plaintiff or its, her or his counsel (Plaintiff) must
10 coordinate with Defendant or its, her or his counsel (Defendant) and select a mutually agreed
11 upon date and time for the MSC prior to the trial date. Plaintiff shall also provide the name, email
12 address, and phone number for Defendant when registering the case for an MSC.

13 A MSC brief shall be lodged by each party at ResolveLawLA.com and served on all
14 parties not less than five court days before the scheduled MSC. The settlement conference
15 statement shall be limited to five pages on the MSC Brief and 10 pages for
16 exhibits. ResolveLawLA MSCs are available at 9 a.m. and 1:30 p.m. Monday through Friday,
17 excluding court holidays, and are conducted on a virtual platform. After a MSC is scheduled,
18 the ResolveLawLA system will send notifications via text and/or email and will include a link
19 for counsel, the parties, and insurance representatives to join the MSC remotely.

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23 ¹ Cases with cross-complaints or separately represented defendants are not eligible.

2022-SJ-008-02

1 Pursuant to California Rules of Court, rule 3.1380(b) and Superior Court, Los Angeles
2 County, Local Rules, rule 3.25(d), counsel, the parties, and persons with full authority to settle
3 the case (including insurance company representatives) must attend the MSC virtually unless a
4 judicial officer has excused the virtual appearance for good cause. Once Defendants are notified
5 that a case has been scheduled for a MSC, Defendants shall create their own login to the
6 ResolveLawLA.com system, and shall list all parties, party representatives and insurance
7 adjusters' names, phone numbers, and emails where indicated. In the event the MSC needs to be
8 canceled or rescheduled, it must be canceled through ResolveLawLA.

9 If the case settles before a scheduled MSC, parties shall forthwith notify the PI Hub Court
10 to which the case is assigned of such settlement. The parties should also document their
11 settlement agreement in writing signed by all parties whether before or at the scheduled MSC.

12 14. Trials

13 The PI Hub Courts do not conduct trials. On the trial date, all parties and/or their trial
14 counsel **must appear in person** in the PI Hub Court assigned to the case. Upon confirming that
15 the parties are trial-ready, the PI Hub Court will obtain a Trial Court assignment from Stanley
16 Mosk Courthouse, Department 1, and will inform the parties and/or trial counsel of the
17 assignment. The parties then have 20 minutes within which to exercise a peremptory challenge
18 to the assigned trial court, assuming that party had not previously exercised the party's right to
19 make such a challenge.

20 Should a Plaintiff fail to appear at trial, the PI Hub Court will dismiss the case without
21 prejudice. (Code of Civil Procedure section 581(b)(3).) If a Defendant fails to appear at trial, the
22 PI Hub court will obtain a Trial Court assignment from Department 1 and the Plaintiff will

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1 proceed with an uncontested trial pursuant to Code of Civil Procedure section 594 and *Warden*
2 *v. Lamb* (1929) 98 Cal.App. 738, 741.

3 **15. Sanctions**

4 The Court has discretion to impose sanctions for any violation of this Standing Order.
5 (Code of Civil Procedure, sections 128.7, 187; Government Code, section 68608(b).)

6
7 Dated: 5/4/22



8 Judge David J. Cowan
9 Supervising Judge, Civil Division
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EXHIBIT B

CT Corporation
Service of Process Notification

08/16/2022
CT Log Number 542129074

Service of Process Transmittal Summary

TO: CATHY SCHUDA
Target Corporation
1000 NICOLLET MALL, MS: TPS-3155
MINNEAPOLIS, MN 55403-2542

RE: Process Served in California

FOR: Target Corporation (Domestic State: MN)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Re: Vardan Grigoryan, an individual // To: Target Corporation

CASE #: 22STCV26366

NATURE OF ACTION: Personal Injury - Failure to Maintain Premises in a Safe Condition

PROCESS SERVED ON: C T Corporation System, GLENDALE, CA

DATE/METHOD OF SERVICE: By Process Server on 08/16/2022 at 01:24

JURISDICTION SERVED: California

ACTION ITEMS: CT has retained the current log, Retain Date: 08/16/2022, Expected Purge Date: 08/21/2022
Image SOP
Email Notification, Non Employee Litigation Target gl.legal@target.com

REGISTERED AGENT CONTACT: C T Corporation System
330 N BRAND BLVD
STE 700
GLENDALE, CA 91203
877-564-7529
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

PROCESS SERVER DELIVERY DETAILS

Date: Tue, Aug 16, 2022
Server Name: John Abramyan

Entity Served	TARGET CORPORATION
Case Number	22STCV26366
Jurisdiction	CA

Inserts		



EXHIBIT C



(StatusOnLine.aspx?sessionId=4cbfc160-7acc-4cd7-8cf5-eccf78b52908)

Subsequent Filing Into Case 22STCV26366 - Order Number 454985-JTI291049

Envelope Number 22LA01155220

Location:

Spring Street Courthouse

▼

Case Category:

Premise Liability (e.g., dangerous conditions of property, slip, trip, or fall)

▼

Case Type:

Civil Unlimited

▼

Fee Name	Amount
Not Available	0.00

Parties In Case:

Party Type	Party Name	Lead Attorney
Plaintiff	Vardan Grigoryan	Not Applicable
Defendant	TARGET CORPORATION, a corporation	Not Applicable

Filings In Order:

Filing Code	File Name	Description	Download Document
RES010	LA311997.4246520.Answer.01.Original Compl't.Grigroryan.091522.State.pdf	Answer	Display RES010 (https://s3-us-west-1.amazonaws.com/docs.for.jti/Prod/JTI291049.00001.pdf)

Reviewed:

Filing Code	Status	Description	Download Document
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eServe:

Name & Firm	Servee Email	Sent	Viewed
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Reference:

LA311997

Back To Completed eFilings <

Eugene J. Egan (State Bar No. 130108)
eje@manningllp.com
 Gabriella Pedone (State Bar No. 308384)
gap@manningllp.com
MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP
 801 S. Figueroa St, 15th Floor
 Los Angeles, California 90017-3012
 Telephone: (213) 624-6900
 Facsimile: (213) 624-6999

Attorneys for Defendants, TARGET
 CORPORATION

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

VARDAN GRIGORYAN, an individual,

Plaintiff,

v.

TARGET CORPORATION, a corporation,
 and DOES 1 to 20, inclusive,

Defendant.

Case No. 22STCV26366

The Hon. Audra Mori, Dept. 31

**DEFENDANT TARGET
 CORPORATION'S ANSWER TO
 COMPLAINT; DEMAND FOR JURY
 TRIAL**

Complaint Filed: 08/15/22

Pursuant to Sections 431.10, *et seq.*, of the California Code of Civil Procedure, Defendant
 TARGET CORPORATION ("Defendant") answer the Complaint of Plaintiff VARDEN
 GRIGORYAN ("Plaintiff").

GENERAL DENIAL

1. Defendant denies generally and specifically each and every allegation in the
 Complaint, pursuant to Code of Civil Procedure §431.30, and further denies that Plaintiff was
 injured, or that Plaintiff sustained, or will sustain damages in the sums alleged in the Complaint, or
 in any sum, or at all.

FIRST AFFIRMATIVE DEFENSE

2. The Complaint and each and every purported cause of action therein fails to state
 facts sufficient to constitute a cause of action against this answering Defendant. This affirmative
 defense is interposed to the Complaint in its entirety and separately as to each individual cause of

MANNING & KASS
 ELLROD, RAMIREZ, TRESTER LLP
 ATTORNEYS AT LAW

1 action therein although not restated under separate headings as to each cause of action.

2 **SECOND AFFIRMATIVE DEFENSE**

3 3. This answering Defendant is informed and believes and thereupon alleges that
4 plaintiff failed to exercise reasonable and ordinary care, caution or prudence for his own safety, in
5 order to avoid the alleged accident. The resulting injuries and damages, if any, sustained by
6 plaintiff were proximately caused and contributed to by the negligence of plaintiff himself. This
7 affirmative defense is interposed to the Complaint in its entirety and separately as to each
8 individual cause of action therein although not restated under separate headings as to each cause of
9 action.

10 **THIRD AFFIRMATIVE DEFENSE**

11 4. Defendant alleges that insofar as Defendant has delegated any duty to any
12 subordinate, such delegation was at all times done in good faith, and with due care. Plaintiff is
13 therefore not liable for any act or omission of any subordinate.

14 **FOURTH AFFIRMATIVE DEFENSE**

15 5. Defendant alleges that Plaintiff's recovery is reduced or diminished by Plaintiff's
16 failure to mitigate his damages. This affirmative defense is interposed to the Complaint in its
17 entirety and separately as to each individual cause of action therein although not restated under
18 separate headings as to each cause of action.

19 **FIFTH AFFIRMATIVE DEFENSE**

20 6. Defendant alleges that Plaintiff has not been injured or damaged as a proximate
21 result of any act or omission for which Defendant is responsible.

22 **SIXTH AFFIRMATIVE DEFENSE**

23 7. If Plaintiff sustained any damage as alleged in the Complaint, that damage was
24 proximately caused and contributed to by other parties to this action, whether served or not served,
25 or by other persons or entities not parties to this action. The proportionate degree of negligence or
26 fault of each of said other persons or entities must be determined and prorated and any judgment
27 that might be rendered against defendant herein must be reduced not only by that degree of
28 comparative negligence and fault found to exist as to plaintiff, but also as to the total of that

1 degree of negligence or fault found to exist as to said other persons or entities. This affirmative
 2 defense is interposed to the Complaint in its entirety and separately as to each individual cause of
 3 action therein although not restated under separate headings as to each cause of action.

4 **SEVENTH AFFIRMATIVE DEFENSE**

5 8. This answering Defendant denies that a dangerous condition existed. However, if
 6 it is determined that a dangerous condition in fact did exist, such condition was open and obvious.
 7 This affirmative defense is interposed to the Complaint in its entirety and separately as to each
 8 individual cause of action therein although not restated under separate headings as to each cause of
 9 action.

10 **EIGHT AFFIRMATIVE DEFENSE**

11 9. This answering Defendant denies that a dangerous condition existed. However, if
 12 it is determined that a dangerous condition in fact did exist, such condition was trivial. This
 13 affirmative defense is interposed to the Complaint in its entirety and separately as to each
 14 individual cause of action therein although not restated under separate headings as to each cause of
 15 action.

16 **NINTH AFFIRMATIVE DEFENSE**

17 10. Defendant alleges that other persons, either known and/or unknown to this
 18 answering Defendant, are in whole or in part liable to plaintiff and/or proximately or legally
 19 caused plaintiff's alleged injuries. Pursuant to Civil Code Section 1431.2, Plaintiff must look to
 20 these other persons for recompense for Plaintiff's alleged damages. This affirmative defense is
 21 interposed to the Complaint in its entirety and separately as to each individual cause of action
 22 therein although not restated under separate headings as to each cause of action.

23 **TENTH AFFIRMATIVE DEFENSE**

24 11. Defendant alleges that Plaintiff engaged in conduct and activities with respect to
 25 the subject of this Complaint, by reason of said activities and conduct, plaintiff is estopped from
 26 asserting any claims for damages or seeking any other relief against this answering defendant.
 27 This affirmative defense is interposed to the Complaint in its entirety and separately as to each
 28 individual cause of action therein although not restated under separate headings as to each cause of

1 action.

2 **ELEVENTH AFFIRMATIVE DEFENSE**

3 12. Defendant alleges that Plaintiff engaged in conduct and activities sufficient to
4 constitute a waiver of any alleged breach of duty, negligence, act, omission, or any other conduct,
5 if any, as set forth in the Complaint. This affirmative defense is interposed to the Complaint in its
6 entirety and separately as to each individual cause of action therein although not restated under
7 separate headings as to each cause of action.

8 **TWELFTH AFFIRMATIVE DEFENSE**

9 13. Defendant alleges that the injuries and damages of which Plaintiff complains were
10 proximately caused by or contributed to by the acts of other defendants, Cross-Defendants,
11 persons and/or other entities, and that said acts were an intervening and superseding cause of the
12 injuries and damages, if any, of which the plaintiff complains, thus barring Plaintiff from any
13 recovery against this answering defendant. This affirmative defense is interposed to the
14 Complaint in its entirety and separately as to each individual cause of action therein although not
15 restated under separate headings as to each cause of action.

16 **THIRTEENTH AFFIRMATIVE DEFENSE**

17 14. That the Complaint was brought without reasonable cause and without a good faith
18 belief that there was a justifiable controversy under the facts of the law which warranted the filing
19 of the Complaint against this responding defendant. Plaintiff should therefore be responsible for
20 all defendant's necessary and reasonable defense costs, as more particularly set forth in California
21 Code of Civil Procedure Section 1038. This affirmative defense is interposed to the Complaint in
22 its entirety and separately as to each individual cause of action therein although not restated under
23 separate headings as to each cause of action.

24 **FOURTEENTH AFFIRMATIVE DEFENSE**

25 15. Plaintiff's Complaint and each and every cause of action therein contained are
26 barred by any and all applicable statutes of limitations, including, but not limited to Code of Civil
27 Procedure Sections 335.1 and 342. This affirmative defense is interposed to the Complaint in its
28 entirety and separately as to each individual cause of action therein although not restated under

1 separate headings as to each cause of action.

2 **FIFTEENTH AFFIRMATIVE DEFENSE**

3 16. Plaintiff's Complaint and each and every cause of action therein contained are
4 barred by the doctrine of laches. This affirmative defense is interposed to the Complaint in its
5 entirety and separately as to each individual cause of action therein although not restated under
6 separate headings as to each cause of action.

7 **SIXTEENTH AFFIRMATIVE DEFENSE**

8 17. This answering Defendant denies that a dangerous condition existed. However, if
9 it is determined that a dangerous condition in fact did exist, such condition did not exist for a
10 sufficiently reasonable amount of time as to give actual or constructive notice of the condition.
11 This affirmative defense is interposed to the Complaint in its entirety and separately as to each
12 individual cause of action therein although not restated under separate headings as to each cause of
13 action.

14 **SEVENTEENTH AFFIRMATIVE DEFENSE**

15 18. This Defendant presently has insufficient knowledge or information on which to
16 form a belief as to whether it may have additional, as yet unstated affirmative defenses available.
17 Defendant herein reserves the right to assert additional defenses in the event that the discovery
18 indicates that they would be appropriate. This affirmative defense is interposed to the Complaint
19 in its entirety and separately as to each individual cause of action therein although not restated
20 under separate headings as to each cause of action.

21 **EIGHTEENTH AFFIRMATIVE DEFENSE**

22 19. Plaintiff's Complaint and each purported cause of action and/or form of recovery
23 contained therein, is barred to the extent that Plaintiff lacks standing to assert any of the causes of
24 action and/or form of recovery contained in the Complaint because Plaintiff has not suffered any
25 injury-in-fact or for which Plaintiff does not have a private right of action.

26 //

27 //

28 //

1 WHEREFORE, Defendant prays for relief as follows:

2 1. That the Complaint be dismissed, with prejudice and in its entirety;

3 2. That Plaintiff take nothing by reason of this Complaint and that judgment be
4 entered against Plaintiff and in favor of Defendants;

5 3. That Defendant be awarded their costs incurred in defending this action;

6 4. That Defendant be granted such other and further relief as the Court may deem just
7 and proper.

8 DATED: September 15, 2022

MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP

9
10
11 By: /s/ Gabriella Pedone

Eugene J. Egan

Gabriella Pedone

Attorneys for Defendants, TARGET
CORPORATION

MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP
ATTORNEYS AT LAW

DEMAND FOR JURY TRIAL

Defendant, TARGET CORPORATION, hereby demand trial of this matter by jury.

DATED: September 15, 2022

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

By: /s/ Gabriella Pedone

Eugene J. Egan

Gabriella Pedone

Attorneys for Defendants, TARGET
CORPORATION

MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP
ATTORNEYS AT LAW

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 801 S. Figueroa St, 15th Floor, Los Angeles, CA 90017-3012.

On September 15, 2022, I served true copies of the following document(s) described as **DEFENDANT TARGET CORPORATION'S ANSWER TO COMPLAINT; DEMAND FOR JURY TRIAL** on the interested parties in this action as follows:

Armen Kiramijyan, SBN 276723
KAASS LAW
815 E. Colorado, St., Suite 220
Glendale, CA 91205
Tel: (310) 943-1171
Email: litigation@kaass.com

Attorney for Plaintiff
Vardan Grigoryan

ONLY BY ELECTRONIC TRANSMISSION: Only by emailing the document(s) to the persons at the e-mail address(es). This is necessitated during the declared National Emergency due to the Coronavirus (COVID-19) pandemic because this office will be working remotely, not able to send physical mail as usual, and is therefore using only electronic mail. No electronic message or other indication that the transmission was unsuccessful was received within a reasonable time after the transmission. We will provide a physical copy, upon request only, when we return to the office at the conclusion of the National Emergency.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 15, 2022, at Los Angeles, California.

/s/ Sandra Alarcon
Sandra Alarcon

EXHIBIT D



P.O. BOX, #944

OFFICE 310.943.1171

GLENDALE, CALIFORNIA 91209

FACSIMILE 310.943.1172

March 4, 2022

Via Facsimile

daniel.galbreath@sedgwick.com

Attention: Dan Galbreath

Sedgwick Claims Management Services, Inc.

PO BOX 14453

Lexington, KY 40512

Telephone: 612-313-2369

800-533-8723 Ext. 32396

Facsimile: 800-922-9165

RE: SUBMISSION OF DEMAND PACKAGE

Our Client(s)	: Vardan Grigoryan
Your Insured	: Target Corporation
Claim Number	: 128221H0001
Date of Loss	: November 8, 2020

Dear Mr. Galbreath:

This office represents the interests of Vardan Grigoryan in connection with the November 8, 2020 incident wherein our client sustained serious injuries and consequential damages.

Please find enclosed medical reports and bills.

TIME SENSITIVE POLICY LIMITS DEMAND

The purpose of this letter is to clearly and concisely communicate a demand that you agree to pay our client your insured's entire policy limit in full and final settlement of his claim. The facts and circumstances surrounding this claim confirm that your insured is legally liable for our clients' damages and that the amount of those damages will most assuredly exceed the stated policy limit should the case proceed to verdict. As a result,



P.O. BOX, #944

OFFICE 310.943.1171

GLENDALE, CALIFORNIA 91209

FACSIMILE 310.943.1172

any reasonable insurance company would promptly and unequivocally agree to pay the policy limit in exchange for a full and final release of all claims.

DEADLINE TO ACCEPT DEMAND

This offer to settle for the policy limit will expire of its own accord within **Fifteen** (15) days from the date of this letter. This provides SEDGWICK CLAIMS MANAGEMENT SERVICES, INC., with sufficient time and opportunity to evaluate all the information contained in this letter, cross reference it with the information in your claims file, and to conduct whatever interviews and additional investigation may be necessary to make an informed decision. You will not be reminded by this office that the deadline is about to expire. This demand will not be extended or waived for any reason other than in writing and will not be repeated even if **SEDGWICK CLAIMS MANAGEMENT SERVICES, INC.**, decides to pay the policy limit after the expiration date. Under California law, our client is not obligated to repeat the policy limit demand after the expiration of this offer or to leave it open beyond a reasonable deadline.

This offer to settle for the GLOBAL POLICY LIMITS will expire by its own terms on **FRIDAY, MARCH 18, 2022** at 4:00 p.m. Pacific Standard Time.

Thank you in advance for your anticipated courtesy and cooperation in this matter.

Best regards,

KAASS LAW

Lucy Abett

Personal Injury Team

pit@kaass.com

Enclosures: medical reports and bills

EXHIBIT E

Alex Padilla
California Secretary of State

Business Search - Entity Detail

The California Business Search is updated daily and reflects work processed through Thursday, May 21, 2020.
Please refer to document **Processing Times** for the received dates of filings currently being processed. The data provided is not a complete or certified record of an entity. Not all images are available online.

C0536463 TARGET CORPORATION

Registration Date:	11/24/1967
Jurisdiction:	MINNESOTA
Entity Type:	FOREIGN STOCK
Status:	ACTIVE
Agent for Service of Process:	<u>C T CORPORATION SYSTEM (C0168406)</u> To find the most current California registered Corporate Agent for Service of Process address and authorized employee(s) information, click the link above and then select the most current 1505 Certificate.
Entity Address:	1000 NICOLLET MALL MINNEAPOLIS MN 55403
Entity Mailing Address:	1000 NICOLLET MALL, TPS 3155 MINNEAPOLIS MN 55403

A Statement of Information is due EVERY year beginning five months before and through the end of November.

Document Type	↕	File Date	↕	PDF
SI-NO CHANGE		10/22/2019		
PUBLICLY TRADED DISCLOSURE		06/21/2019		
PUBLICLY TRADED DISCLOSURE		06/28/2018		
SI-COMPLETE		10/24/2017		
PUBLICLY TRADED DISCLOSURE		06/23/2017		
PUBLICLY TRADED DISCLOSURE		06/21/2016		
PUBLICLY TRADED DISCLOSURE		06/25/2015		

Document Type	File Date	PDF
PUBLICLY TRADED DISCLOSURE	07/18/2014	
PUBLICLY TRADED DISCLOSURE	06/27/2013	
PUBLICLY TRADED DISCLOSURE	06/20/2012	
PUBLICLY TRADED DISCLOSURE	05/31/2011	
PUBLICLY TRADED DISCLOSURE	06/01/2010	
PUBLICLY TRADED DISCLOSURE	06/09/2009	
PUBLICLY TRADED DISCLOSURE	06/19/2008	
PUBLICLY TRADED DISCLOSURE	06/22/2007	
PUBLICLY TRADED DISCLOSURE	06/07/2006	
PUBLICLY TRADED DISCLOSURE	06/23/2005	
PUBLICLY TRADED DISCLOSURE	12/03/2004	
PUBLICLY TRADED DISCLOSURE	12/22/2003	Image unavailable. Please request paper copy.
PUBLICLY TRADED DISCLOSURE	12/05/2003	Image unavailable. Please request paper copy.
PUBLICLY TRADED DISCLOSURE	11/25/2003	Image unavailable. Please request paper copy.
AMENDED REGISTRATION	02/11/2000	
AMENDED REGISTRATION	07/23/1985	
AMENDED REGISTRATION	07/22/1969	Image unavailable. Please request paper copy.
REGISTRATION	11/24/1967	Image unavailable. Please request paper copy.

* Indicates the information is not contained in the California Secretary of State's database.

- If the status of the corporation is "Surrender," the agent for service of process is automatically revoked. Please refer to California Corporations Code **section 2114** for information relating to service upon corporations that have surrendered.
- For information on checking or reserving a name, refer to **Name Availability**.
- If the image is not available online, for information on ordering a copy refer to **Information Requests**.

- For information on ordering certificates, status reports, certified copies of documents and copies of documents not currently available in the Business Search or to request a more extensive search for records, refer to **Information Requests**.
- For help with searching an entity name, refer to **Search Tips**.
- For descriptions of the various fields and status types, refer to **Frequently Asked Questions**.

Modify Search

New Search

Back to Search Results

Business Record Details »

Minnesota Business Name

Target Corporation**Business Type**

Business Corporation (Domestic)

MN Statute

302A

File Number

11-AA

Home Jurisdiction

Minnesota

Filing Date

02/11/1902

Status

Active / In Good Standing

Renewal Due Date

12/31/2020

Registered Office Address1010 Dale St N
St Paul, MN 55117-5603
USA**Number of Shares**

6,005,000,000

Registered Agent(s)

C T Corporation System

Chief Executive OfficerBRIAN C CORNELL
1000 Nicollet Mall
Mpls, MN 55403
USA**Principal Executive Office Address**1000 Nicollet Mall
Mpls, MN 55403
USA**Filing History****Filing History**Select the item(s) you would like to order:

<input type="checkbox"/>	Filing Date	Filing	Effective Date
<input type="checkbox"/>	02/11/1902	Original Filing - Business Corporation (Domestic)	
	02/11/1902	Business Corporation (Domestic) Business Name (Business Name: Goodfellow Dry Goods Co.)	
<input type="checkbox"/>	05/25/1903	Business Corporation (Domestic) Business Name (Business Name: Dayton Dry Goods Co.)	
<input type="checkbox"/>	05/17/1911	Business Corporation (Domestic) Business Name (Business Name: The Dayton Company)	
<input type="checkbox"/>	08/04/1915	Business Corporation (Domestic) Change of Shares	

<input type="checkbox"/>	Filing Date	Filing	Effective Date
<input type="checkbox"/>	02/04/1919	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	11/29/1922	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	07/25/1928	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	08/12/1931	Business Corporation (Domestic) Duration	
<input type="checkbox"/>	02/16/1939	Amendment - Business Corporation (Domestic)	
<input type="checkbox"/>	07/25/1939	Amendment - Business Corporation (Domestic)	
<input type="checkbox"/>	03/18/1949	Business Corporation (Domestic) Duration	
<input type="checkbox"/>	12/30/1950	Consent to Use of Name - Business Corporation (Domestic)	
<input type="checkbox"/>	07/28/1955	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	12/31/1958	Merger - Business Corporation (Domestic)	
	12/31/1958	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	02/02/1959	Merger - Business Corporation (Domestic)	
<input type="checkbox"/>	04/30/1963	Amendment - Business Corporation (Domestic)	
<input type="checkbox"/>	09/02/1964	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	03/02/1966	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	12/06/1966	Amendment - Business Corporation (Domestic)	
<input type="checkbox"/>	01/27/1967	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	05/29/1967	Consent to Use of Name - Business Corporation (Domestic)	
<input type="checkbox"/>	07/28/1967	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	09/06/1967	Business Corporation (Domestic) Business Name (Business Name: Dayton Corporation)	
	09/06/1967	Registered Office and/or Agent - Business Corporation (Domestic)	
<input type="checkbox"/>	11/24/1967	Merger - Business Corporation (Domestic)	
<input type="checkbox"/>	12/08/1967	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	05/07/1968	Merger - Business Corporation (Domestic)	
<input type="checkbox"/>	02/13/1969	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	03/18/1969	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	05/22/1969	Amendment - Business Corporation (Domestic)	

<input type="checkbox"/>	Filing Date	Filing	Effective Date
<input type="checkbox"/>	06/20/1969	Business Corporation (Domestic) Business Name (Business Name: Dayton-Hudson Corporation)	
<input type="checkbox"/>	07/23/1970	Amendment - Business Corporation (Domestic)	
<input type="checkbox"/>	06/16/1972	Registered Office and/or Agent - Business Corporation (Domestic)	
<input type="checkbox"/>	01/04/1974	Merger - Business Corporation (Domestic)	
<input type="checkbox"/>	04/25/1975	Merger - Business Corporation (Domestic)	
<input type="checkbox"/>	04/25/1975	Merger - Business Corporation (Domestic)	
<input type="checkbox"/>	01/27/1976	Merger - Business Corporation (Domestic)	
<input type="checkbox"/>	04/27/1976	Merger - Business Corporation (Domestic)	
<input type="checkbox"/>	02/01/1977	Merger - Business Corporation (Domestic)	
<input type="checkbox"/>	05/24/1978	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	06/24/1982	Business Corporation (Domestic) Active Status Report	
<input type="checkbox"/>	11/22/1982	Merger - Business Corporation (Domestic)	
<input type="checkbox"/>	05/26/1983	Business Corporation (Domestic) Change of Shares	
<input type="checkbox"/>	04/19/1984	Consent to Use of Name - Business Corporation (Domestic)	
<input type="checkbox"/>	05/31/1985	Business Corporation (Domestic) Restated Articles	
	05/31/1985	Business Corporation (Domestic) Business Name (Business Name: Dayton Hudson Corporation)	
<input type="checkbox"/>	01/15/1986	Merger - Business Corporation (Domestic)	
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<input type="checkbox"/>	Filing Date	Filing	Effective Date
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<input type="checkbox"/>	Filing Date	Filing	Effective Date
<input type="checkbox"/>	11/22/2010	Merger - Business Corporation (Domestic)	
<input type="checkbox"/>	4/30/2015	Merger Survivor - Business Corporation (Domestic)	5/1/2015 12:01 AM
<input type="checkbox"/>	10/12/2015	Merger Survivor - Business Corporation (Domestic)	10/16/2015 12:01 AM
<input type="checkbox"/>	1/27/2016	Merger Survivor - Business Corporation (Domestic)	1/30/2016 11:59 PM
<input type="checkbox"/>	1/28/2016	Merger Survivor - Business Corporation (Domestic)	1/30/2016 11:59 PM
<input type="checkbox"/>	4/18/2016	Registered Office and/or Agent - Business Corporation (Domestic)	
<input type="checkbox"/>	9/16/2016	Registered Office and/or Agent - Business Corporation (Domestic)	